- - D R A F T -

US EPA MULTIPURPOSE GRANT:

Project Title: EXIDE AREA LEAD-BASED PAINT ABATEMENT

Applicant Information:
California Department of Toxic Substances Control
1001 "I" Street
Sacramento CA 95814
Phone Numbers?
Contact Name:
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DUNS No.: 9490108700000

Total Cost: $130,782 (state-identified priority)

Project Description: Address lead-based paint contamination in privately-owned housing in an environmental justice area in Los Angeles County with a population of approximately 90,000 residents (predominantly Hispanic) in over 10,000 properties. Part of an ongoing overall lead abatement effort currently focused on cleanup of lead in soils.

PROJECT NARATIVE

BACKGROUND

In March, 2015 a lead battery recycling facility (Exide Technologies) in the City of Vernon, Los Angeles County, was closed down due to evidence that their operation had contaminated thousands of properties in the communities of Vernon, Commerce, Maywood, Bell, East Los Angeles, Huntington Park, and Boyle Heights with lead. The California Department of Toxic Substances Control's (DTSC) sampling results indicated that soils in the area exceeded California standards for lead. The State and Exide have implemented an area-wide cleanup effort. DTSC will remove lead-contaminated soil on 2,500 properties with the highest levels of lead contamination and exposure is the greatest in the Target Area.

PROBLEM

State and Exide funding addresses only lead-contaminated soil and high lead dust levels inside homes, but does not address lead-based paint hazards. The majority of residences in the target area were built prior to 1950 and many contain lead-based paint. DTSC's preliminary screening of 437 properties identified 107 properties (24 percent), with children six years old or younger, with lead-based paint on exteriors in excess of 0.7 mg/cm2 (Los Angeles County's definition of lead-based paint).

A California Department of Public Health (CDPH) analysis has found blood lead levels in children near the former Exide Technologies battery recycling facility in Vernon are

higher than for those who live further from the facility, but that the age of housing in the area appears to play a significant role. When both proximity to the former Exide facility and the year of housing were included, the effect of proximity to Exide on blood lead levels was much smaller. This appears to be because older housing is more common in the areas closer to the Exide facility. CDPH researchers found that 3.11% of young children living in areas near Exide, with many homes built before 1950, had elevated blood lead levels. Only 1.87% of young children had elevated lead levels where most homes were built after 1940.

PROPOSAL TARGET AREA

The Target Area is within a 1.7 mile radius of the Exide Technologies battery recycling plant in the City of Vernon, Los Angeles County. This primarily Hispanic area includes the communities of Vernon, Bell, Commerce, Huntington Park, Maywood, East Los Angeles, and Boyle Heights. The Target Area can be characterized as a dense industrial/transportation zone surrounded by older homes. The City of Vernon, for example, contains only 30 residential units and the rest of the city is made up of industrial sites. DTSC has identified over 10,000 properties in this area with significant amounts of lead-contaminated soils. While at least eight communities are affected, DTSC is focusing preliminary efforts on three specific "focus areas": the Southern Focus Area includes the City of Maywood; the Northern Focus Area includes properties in Boyle Heights and East Los Angeles; and the Eastern Focus Area includes properties in the City of Commerce. Once sampling and cleanup is completed in the Focus Areas, efforts will then expand out into the remaining Target Area.

Zip Codes for Target Area Communities

Vernon	90058		Huntington Park	90255	East Los Angeles	90022
Commerce	90040		Maywood	90270	Boyle Heights	90023
Bell	90201					

Elevated Blood Lead Data in Target Area

a) Number of children under the age of six (6) with an elevated blood lead level of 5 µg/dL or above.	704 children in Target Area - 19 children within 1 mile of Exide plant - 285 children, from 1 to 4 miles
b) Total number of children under the age of six (6)	11,702 in Target Area
c) Percentage of children under the age of six (6) with an elevated blood lead level of 5 µg/dL or above.	3.58 % within 1 mile of Exide plant 2.41% from 1 to 4 miles
d) Source: DTSC April 8, 2016 report found online at: http://www.dtsc.ca.gov/HazardousWaste/Projects/upload/An-Analysis-of-Children-s-Blood-Lead-Levels-in-the-Area-Around-the-Exide-Site.pdf	

A CDPH study found blood lead levels in children near the former Exide Technologies battery recycling facility in Vernon are higher than for those who live further from the facility, but that the age of housing in the area appears to play a significant role. Most of

the homes in this area were built prior to 1950 and are likely to contain significant amounts of lead-based paints. The analysis also found that 3.58% of young children, within one mile of the former Exide facility, had levels of 4.5 micrograms of lead or more per deciliter (mg/dl) of blood. By comparison, the CDPH study found that in Los Angeles County overall, 1.95% of children had levels of 4.5 mg/dl of lead in blood. In the zone greater than one mile from the former Exide facility, but still within the study's broader Exide analysis area, reaching up to 4.5 miles from the facility, the percentage of children in the higher category was 2.41%. The study population comprised all children age younger than six years living in the Exide Analysis Area who had a blood lead test result reported to the State for a specimen obtained during 2012. A total of 11,702 children met the conditions for inclusion in the analysis. Of these, 285 (2.44%) had levels ≥ 4.5 µg/dL, and 18 (0.15%) had levels ≥ 9.5 µg/dL (the CDC's older level of concern).

Income Data in Target Area

a) Percentage of families < 80% AMI in target area	39%
b) Source and date: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates, California	

According to the 2010-2014 American Community Survey, Los Angeles County has over 2 million residents (21%) below 50% of the Area Medium Income Level.

Housing Age and Tenure Data in Target Area

a) pre-1960 rental housing units	33,689
b) pre-1960 owner-occupied housing units	16,056
c) pre-1960 vacant housing units	2,535
d) total number of pre-1960 housing units, (a + b + c)	52,280
d1) percentage of pre-1960 rental housing units	45.3%
d2) percentage of pre-1960 vacant housing units	3.4%
Source: 2010-2014 American Community Survey 5-Year Estimates	

EPA's Environmental Justice Screening Tool provides a graphic representation of areas with a lead potential: homes built before 1960 and areas with children under five (5) years of age. The Target Area shows high concentrations of both.

Other Factors Demonstrating Need: DTSC is currently testing soil contamination throughout the Target Area and at the same time they are conducting a limited (six XRF tests per house) paint testing on residences. Based on their testing with Los Angeles County's 0.7 mg/cm2 standard, they have found 187 homes with at least one positive test result for deteriorated lead-based paint out of 437 homes tested (43 percent). Soil testing results identified 561 properties out of 563 properties sampled with hazardous levels of lead in the soil. (Preliminary findings, personal communication, Laszlo Saska, P.E., DTSC, April 25, 2016.)

The Target Area is now a known lead-contaminated zone. The property values of every residential unit in the Target Area is likely to have dropped due to the lead-contaminated soil. Soil remediation will provide some economic relief to home-owners in the Target

Area, and may help in bringing back property values. Because of the hyper-awareness of lead contamination in the Target Area, the ability to sell these homes in the future for their value is in jeopardy. Besides reducing health effects from lead poisoning, eliminating lead-based paint hazards in these homes will improve property values and provide some economic relief to an area that was lead contaminated.

GOALS

1. Build and Establish Partnerships: DTSC is collaborating with the California Department of Community Services and Development (CSD) to address lead contamination in the Exide area. DTSC has and will continue to conduct extensive soil testing and lead-based paint screening on homes utilizing State funding in the Target Area. CSD has an established Lead Hazard Control Program (LHCP) to address lead hazards in privately-owned homes in California. The Program is primarily funded through grants from the U.S. Department of Housing and Urban Development (HUD). CSD has a local community-based non-profit organization, Maravilla Foundation based in the city of Commerce, that currently provides LPB services in this area as a sub-grantee to CSD. Maravilla has been partnered with CSD for years and has extensive connections in the Exide-area neighborhoods. CSD has limited funding available from its current HUD grants which are now being redirected to the Target Area. CSD, in partnership with DTSC, has applied for another round of HUD funding which will be directed towards the Target Area. Unfortunately, the HUD funding does not cover all costs and most importantly cannot be used for zero-bedroom units, e.g., studio apartments. The current CSD HUD funding plus the proposed new HUD grant funding, if awarded, will still not be sufficient to address the lead-based paint problems in the Target Area.

2. Comprehensive Lead Hazard Control Program: This proposal represents a joint effort between DTSC's Cleanup Program's soil remediation activities and CSD's Lead Hazard Control Program to more comprehensively address lead contamination in the Target Area. The State of California has provided DTSC funding and mandated that they address lead-contaminated soil issues caused by the former Exide battery recycling plant in the Target Area. While they are funded to address lead hazards in the soil they are not funded to remediate other sources of lead poisoning - lead-based paint - that are also impacting the local residents – especially young children living in the area. Unless all sources of lead contamination are appropriately addressed in a coordinated, comprehensive manner, the problem of lead poisoning of residents will continue. This collaboration combines two different programs' resources to synergistically address lead poisoning issues in environmental justice communities in Los Angeles County burdened by multiple sources of pollution.

SPECIFIC PROPOSAL

Unless there is an effort on a federal and/or state level to bring additional funding sources into this area, the current LBP work is unlikely to be sustained. Private homeowners in low-income areas do not have the resources to have lead hazard remediation conducted. Landlords, unless forced to remediate their buildings, will do little to fix lead issues. Local communities are financially cash-strapped and cannot afford to develop their own lead hazard control efforts. There are no other funding

streams currently available to deal with a problem as great as this LBP issue.

There are over 10,000 properties, mostly homes, in the Target Area and over 90,000 residents. Based on initial estimates of homes with deteriorated lead-based paint, the likelihood is there are 3-4,000 homes with deteriorated lead–based paint. Based on CSD's experience through their existing Lead Hazard Control Program, the average cost to control lead hazards in these homes is $10,000 per unit. Thus it could cost $30 – $40 billion to just implement interim controls. Some units are expected to require less than $10,000, but others will cost more. All efforts possible will be employed to generate cost savings by closely coordinating DTSC's soil cleanup efforts with CSD's Lead Hazard Control Program in order to maximize the number of units cleared of lead and LPB hazards.

Through special legislation, DTSC has been provided $176 million in State funding to expedite and expand soil testing at residential properties, schools, daycare centers and parks within the Target Area. This funding will also provide for the cleanup of lead contaminated soil at approximately 2,500 properties where lead levels are the highest and potential exposure the greatest. To date, DTSC has been spending between $45,000 to $50,000 per unit on soil sampling and cleanup.

BUDGET

The entire proposed $130,782 will be for Contractual Services and will be directly allocated to the CSD Lead Hazard Control Program provider, Maravilla Foundation, currently operating in the Exide area and will be used to address gaps in the HUD LBP funding such as zero-bedroom units. The priority for all LBP funding is on homes with LBP contamination with children age six and under present.

Key tasks under CSD's Lead Hazard Control Program include:

1. Outreach and education
2. Prioritization and establishing resident eligibility
3. Intake and enrollment
4. Compliance with HIPAA (Health Insurance Portability and Accountability Act of 1996)
5. Lead-based paint inspection/risk assessment
6. Lead hazard control work on housing units, including lead dust cleaning
7. Clearance inspection
8. Project monitoring and oversight

The Multipurpose Grant funding will be principally directed to Tasks 3 through 7. Tasks 1 and 2 will be accomplished through improved coordination between the DTSC soil remediation efforts and CSD's Lead Hazard Control Program by utilizing cross-trained DTSC staff. DTSC is leading the overall work in the Target Area and is the first agency to directly contact the local residents. This initial effort includes obtaining access agreements and sampling of the properties. The state agencies, DTSC and CSD, are actively reviewing their respective processes and looking for further areas in which to achieve overall program efficiencies and effectiveness. As improvements are identified, they will be immediately incorporated into the overall process in order to effect cost

savings, increase the number of units abated for LPB hazards and improve overall program success.

ROLES AND RESPONSIBILITIES

DTSC is the lead agency in charge of the overall cleanup of lead contaminated soil in the Target Area. Through their assessment efforts, DTSC will be identifying homes that have LBP issues that need to be addressed. DTSC will then coordinate with CSD and their subgrantee Maravilla Foundation to address those LBP issues with assistance wherever possible from DTSC.

TIMELINE AND MILESTONES

DTSC's soil cleanup efforts are currently underway. CSD has been working with DTSC for several months to integrate their current LBP program utilizing HUD and other funding into the overall cleanup process. With assistance from DTSC, CSD applied for additional HUD funding in late April. Although DTSC's sampling program will continue, their cleanup efforts will temporarily cease while an EIR is prepared for the remainder of the cleanup efforts. By the end of June or very early July, DTSC will have completed soil cleanup on 50 homes. Exide has previously cleanup up 219 homes using their own funding. Upon completion of the CEQA process, DTSC will again begin cleanup on an additional 2,450 properties. In the interim, LBP abatement efforts will continue on properties identified through DTSC sampling work. Specific times and dates are being worked out.

Output: Number of properties having LBP contamination addressed.

Outcome: Elimination of lead hazards in order to protect the health of residents – particularly children – in an environmental justice area.

Reporting Requirements: Annual progress reports at a minimum plus a final report.